

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**THOMAS E. PEREZ, Secretary of Labor,
United States Department of Labor**

Plaintiff

v.

**CHIMES DISTRICT OF COLUMBIA, INC.,
et al.**

Defendants

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Case No. 1:15-cv-03315

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THE CHIMES DEFENDANTS' MOTION TO DISMISS

Pursuant to Federal rule of Civil Procedure 12(b)(6), Defendants, Chimes District of Columbia, Inc., Chimes International, Ltd., Martin Lampner, and Albert Bussone (collectively, the "Chimes Defendants") move to dismiss Counts, I, II, IV, V and VI of the Complaint (DE 1). For the reasons set forth in the accompanying Memorandum of Law and exhibits thereto, the Chimes Defendants respectfully request that the Court grant their motion and dismiss with prejudice all claims against them.

Dated: April 18, 2016

Respectfully submitted,

/s/ Harold M. Walter

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Columbia, Inc., Chimes International, Ltd.,
Martin Lampner, & Albert Bussone*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of April, 2016, a copy of the foregoing Chimes Defendants' Motion to Dismiss, Memorandum in Support, and proposed Order were served, via the Court's electronic filing system.

/s/ Harold M. Walter

Harold M. Walter